

Jonathan A. Slaikou  
Name  
493882  
Prison Number  
Spring Creek Correctional Center  
Place of confinement  
3600 Bette Cato Avenue  
Mailing address  
Seward, Alaska 99664  
City, State, Zip  
\_\_\_\_\_  
Telephone

RECEIVED

AUG 23 2022

CLERK, U.S. DISTRICT COURT  
ANCHORAGE, AK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

Jonathan A. Slaikou,  
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

Case No. 3:22-cv-00188-RRB  
(To be supplied by Court)

Alaska Dept. of Correction,  
Sgt. Hamilton, CO Bundy, CO,

Jones, Superintendant Chris,

Lyou, Sgt. Morke, Sidwood, and the commission  
(Enter full names of defendant(s) in this action.  
Do NOT use *et al.*)

Defendant(s).

PRISONER'S  
COMPLAINT UNDER  
THE CIVIL RIGHTS ACT  
42 U.S.C. § 1983

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3).

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Jonathan Slaikou,  
(print your name)

who presently resides at SCCC 3600 Bette Cato Ave, Seward, AK 99664  
(mailing address or place of confinement)

were violated by the actions of the individual(s) named below.

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, Sgt. Hamilton is a citizen of Alaska, and is employed as a Sgt. At ACC E or ACC W for DOC.  
(state) (name) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, CO Bundy is a citizen of AK, and is employed as a CO At ACC E or ACC W for DOC.  
(state) (name) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, CO Jones is a citizen of AK, and is employed as a CO At ACC E or ACC W for DOC.  
(state) (name) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

**\*\*\*REMINDER\*\*\***

**You must exhaust your administrative remedies before your claim can go forward.  
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.**

**C. Causes of Action** (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").



Claim 1: On or about February 26, 2015, my civil right to

cruel and unusual punishment

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by Sgt. Hamilton

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

Sgt. Hamilton was called to the Charlie mod Sally port after I had been raped by inmate Daniel Kashatok. He then called the state troopers. They took the bloody cloths as evidence and his statement and mine. Sgt. Hamilton said in his report that inmate Kashatok admitted to ~~me~~ raping me. Then I was punitively sanctioned even though my claim of Prea was further substantiated by the DOC Prea Coordinator, Johnny Wallace. This official was personally responsible in denying my due process right to prosecute this individual. This Sgt. failed to turn over any of this exculpatory evidence that could have got a conviction for sexual assault in the 1st degree. ~~Dramatize~~ I also have a severe mental health diagnosis which has been hindering my avenues of me getting this into court on time according to the 2 year Statute of limitations. Also, I have been being retaliated against by not only DOC officials but also that inmate himself in August, September of last year he put a hit on my head and I had to be administratively moved.

Prisoner § 1983 - 3  
PS01, Nov. 2013



Claim 2: On or about February 26 2015, my civil right to  
cruel and unusual punishment  
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by CO Bundy who works for DOC  
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

On Feb. 26, 2015 at the 2:00pm count inmate Kashatok pushed me down into the door from where if he pushed hard enough he could have broke my neck. Then he proceeded to anally rape me. Then after the 2:00 count at 3:00pm, cause no CO did any 30 hour check I went up to CO Bundy and told him to call medical. Please I have a bleeding anus. He did so and medical told him to tell me to put in an RFI. Then the only time He even thought about calling a Sgt. was I told him I was just raped during the 2:00pm count. His failure to do a 30 minute check that is required by DOC policy winded me up getting raped by an inmate. This blatant disregard for my safety and well being constitutes a cruel and unusual punishment claim.

Claim 3: On or about Feb 26, 2015, my civil right to  
(Date)

cruel and unusual punishment

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by CO Jones who works for DOC  
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

His failure to protect me from this prison rape by doing a 30 minute walk constitutes a claim of cruel and unusual punishment. His failure to also preserve the evidence for the State troopers investigation for a criminal conviction of rape constitutes hindering prosecution.



Claim 1: On or about May 23, 2016, my civil right to

Due process

(Date)

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by Superintendent Chris Lyon of Anchorage Corr. Complex

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

On May 23, 2016 Superintendent Chris Lyon denied my right to Due process in this case by saying that my Prea case was unsubstantiated. This is one of the reasons why I believe that the Anchorage DA's office Declined to prosecute the case. But upon further review the AK DOC Prea Coordinator further Substantiated my claim of a Prison Rape.

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, or otherwise relating to your imprisonment? X Yes ☒ No

**Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:**

- a. Defendant(s): \_\_\_\_\_
- b. Name of federal court \_\_\_\_\_ Case number: \_\_\_\_\_
- c. The case was dismissed as: \_\_\_ frivolous, \_\_\_ malicious and/or \_\_\_ failed to state a claim
- d. Issue(s) raised: \_\_\_\_\_
- e. Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

**Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:**

- a. Defendant(s): \_\_\_\_\_
- b. Name of federal court \_\_\_\_\_ Case number: \_\_\_\_\_
- c. The case was dismissed as: \_\_\_ frivolous, \_\_\_ malicious and/or \_\_\_ failed to state a claim
- d. Issue(s) raised: \_\_\_\_\_
- e. Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

**Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:**

- a. Defendant(s): \_\_\_\_\_
- b. Name of federal court \_\_\_\_\_ Case number: \_\_\_\_\_
- c. The case was dismissed as: \_\_\_ frivolous, \_\_\_ malicious and/or \_\_\_ failed to state a claim
- d. Issue(s) raised: \_\_\_\_\_
- e. Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

4. Are you in imminent danger of serious physical injury? X Yes \_\_\_\_\_ No

If your answer is "Yes," please describe how you are in danger, without legal argument/authority: The COs and this inmate still have

reach to get me. This inmate pays people  
to get at me and the CO's allow  
it.



## F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ 35,000,000

2. Punitive damages in the amount of \$ 500,000

3. An order requiring defendant(s) to Teach there Co's, Sgt's and there admin. how to handle a Prison Rape.

4. A declaration that This will never happen to any inmate again.

5. Other: The Commissioner and the Director be taught how to Deal with Prison Rape.

Plaintiff demands a trial by jury. X Yes        No

## DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Springcreek Corr. Center on 8-19-22  
(Location) (Date)

Jon Slaiken  
(Plaintiff's Signature)

\_\_\_\_\_  
Original Signature of Attorney (if any) (Date)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Attorney's Address and Telephone Number

Jonathan A. Slater #493882  
Spring Creek Correctional Center  
3600 Bettecato Avenue  
Seward, Alaska 99664



United States District Court  
222 W 7th Avenue #4  
Anchorage, Alaska 99513